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7 Attorney for Benjamin Galecki

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 BENJAMIN GALECKI,

14 Defendant.
15

Case No. 2:15-cr-00285-APG-EJY-2

**Stipulation for Extension of Time
to File Defendant's Response to
the Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)**

(Third Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between
18 Nicholas A. Trutanich, United States Attorney, and Daniel D. Hollingsworth,
19 Assistant United States Attorney, counsel for the United States of America, and
20 Rene L. Valladares, Federal Public Defender, and Amy B. Cleary, Assistant
21 Federal Public Defender, counsel for Defendant Benjamin Galecki, that the
22 response to the Government's Motion to Substitute and Forfeit Property
23 currently due on February 11, 2021, be vacated, continued sixty days, and reset
24 for April 12, 2021.
25
26

1 This Stipulation is entered into for the following reasons:

2 1. Defense counsel requires additional time to effectively and
3 thoroughly investigate this case before filing a response. Defense counsel
4 received Mr. Galecki's physical file from his prior counsel later than expected
5 and, due to remote teleworking limitations the laborious process of scanning this
6 file's documents has taken longer than usual, but is nearing completion. As
7 defense counsel and her staff continue to telework due to the COVID-19
8 pandemic, an additional sixty days is necessary for defense counsel to respond to
9 the government's motion and the complicated forfeiture issues therein.

10 2. The parties agree to the continuance and extension of time.

11 This is the third request for an extension of time.

12 DATED this 8th day of February 2021.

13
14 RENE L. VALLADARES
15 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

16 /s/ Amy B. Cleary
17 By _____
18 AMY B. CLEARY
Assistant Federal Public Defender

/s/ Daniel D. Hollingsworth
By _____
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

19
20
21 **IT IS SO ORDERED:**

22 
23 _____
24 UNITED STATES DISTRICT JUDGE

25 DATED: February 8, 2021
26 _____